

UNITED STATES DISTRICT COURT

for the

District of Massachusetts

United States of America
v.ALEKSEI ANDRIUNIN
a/k/a Alex Andryunin

Case No.

24-mj-6849-MPK

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 2017 - 2024 in the county of Suffolk in the
 District of Massachusetts, the defendant(s) violated:*Code Section*18 U.S.C. § 371
18 U.S.C. § 1343
18 U.S.C. § 1956(h)*Offense Description*Conspiracy to commit market manipulation and wire fraud
Wire fraud
Conspiracy to commit money laundering

This criminal complaint is based on these facts:

See Attached Affidavit of FBI Special Agent Gregory Gerber.

☒ Continued on the attached sheet.

/s/ Gregory Gerber

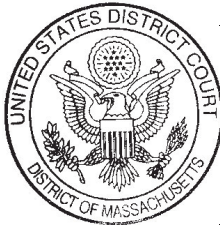
Complainant's signature

FBI Special Agent Gregory Gerber

Printed name and title

Sworn to before me and signed in my presence.

September
24, 2024Date:



Page Kelley
Judge's signatureCity and state: Boston, Massachusetts

Hon. M. Page Kelley, U.S. Magistrate Judge

Printed name and title